UNITED STATES DISTRICT COURT DISTRICT OF PUERTO RICO

In re:

The Financial Oversight and Management Board for Puerto Rico,

as representative of

The Commonwealth of Puerto Rico, et al.,

Debtors.¹

PROMESA Title III No. 17 BK 3283-LTS (Jointly Administered)

INFORMATIVE MOTION OF COBRA ACQUISITIONS LLC REGARDING ITS REQUEST TO BE HEARD AT THE SEPTEMBER 16-17, 2020 OMNIBUS HEARING

Cobra Acquisitions LLC ("<u>Cobra</u>"), by and through counsel, submits this informative motion in response to the Court's *Order Regarding Procedures for September 16-17, 2020 Omnibus Hearing* (Dkt. No. 14202 in Case No. 17-3283) (the "<u>Order</u>"), and respectfully states as follows:

1. Abid Qureshi of Akin Gump Strauss Hauer & Feld LLP, will appear telephonically on behalf of Cobra at the September 16-17, 2020 Omnibus Hearing and seek to be heard on *PREPA's Motion to Allow Administrative Expense Claim* (Dkt. No. 2053 in Case No. 17-4780).

The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283- LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19 BK 5523-LTS) (Last Four Digits of Federal Tax ID: 3801). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

- 2. Sylvia M. Arizmendi, Esq. and Alana M. Vizcarrondo, Esq. of Reichard & Escalera, LLC, will appear telephonically at the same hearing.
- 3. Cobra reserves its right to be heard on any matter presented to the Court and to respond to any statements made by any party related to the above-captioned Title III cases, or any adversary proceeding pending in the Title III cases, to the extent it impacts the rights, claims, or interests of Cobra.

[Signature page follows]

DATED: September 14, 2020

Respectfully submitted,

REICHARD & ESCALERA, LLC

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CERTIFICATE OF SERVICE

We hereby certify that on this same date, we electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to counsel for the parties of record.

/s/Alana M. Vizcarrondo-Santana USDC-PR 301614